IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LIJANA SHESTOPAL, individually and on behalf of all others similarly situated,	)))	
Plaintiff,	))	Case No. 15-cv-8980
v.	))	Hon. William T. Hart
FOLLETT HIGHER EDUCATION GROUP, INC., an Illinois corporation,	)))	Hon. Jeffrey Cole
Defendant.	))	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiff Lijana Shestopal ("Plaintiff"), by her counsel, hereby moves for an extension of time to file a motion for preliminary approval of class action settlement. Plaintiff states the following in support:

1.   On March 8, 2016, the parties in this action reached a settlement in principle at a mediation with the Hon. James Holderman (Ret.).

2.   The parties have worked diligently since that time conducting confirmatory discovery in support of finalizing the written settlement agreement between them.

3.   On July 21, 2016, this Court held a status hearing. The parties informed the Court that Defendant Follett Higher Education Group, Inc. ("Defendant") would soon provide to Plaintiff the last of the parties' planned confirmatory discovery relating to the size of the settlement class and the identities of its members. Plaintiff's counsel also informed the Court that it hoped to file Plaintiff's motion for preliminary approval shortly after reviewing said confirmatory discovery.

The Court ordered Plaintiff to file her motion for preliminary approval of the class action settlement by August 18, 2016. (Dkt. No. 32.)

4.   On July 26, 2016, Defendant sent Plaintiff the confirmatory discovery, which consisted of approximately 10GB of raw data.

5.   Over the next few weeks, Plaintiff analyzed said data. Also during this time, the parties exchanged additional comments and revisions to the written settlement agreement.

6.   Plaintiff plans to provide the 10GB of raw data to a third party with expertise in reviewing said data to confirm that the parties have all data available to provide the settlement class with proper notice of the settlement.

7.   Accordingly, Plaintiff requires a short 21-day extension of time, until September 8, 2016, to file her motion for preliminary approval of the class action settlement.

8.   On August 17, 2016, counsel for Plaintiff contacted counsel for Defendant regarding this motion. Counsel for Defendant stated that Defendant does not oppose this motion.

9.   For the reasons stated above, Plaintiff respectfully submits that good cause exists for this extension of time. The extension of time will not prejudice any party and is not being requested for the purpose of delay, but rather to secure the interests of the settlement class.

10.   Currently, the parties' next status hearing is scheduled for August 25, 2016, at 2:00 p.m. If the Court grants the relief requested in this motion, the parties respectfully suggest that said status hearing be re-scheduled for 21 days thereafter, on September 15, 2016, at 2:00 p.m.

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WHEREFORE, Plaintiff respectfully requests: (a) an extension of time until September 8, 2016, to file her motion for preliminary approval of the class action settlement; (b) that the August 25, 2016, status hearing be rescheduled for September 15, 2016, at 2:00 p.m.; and (c) such other relief as the Court deems just.

Dated: August 17, 2016

Respectfully submitted,

By: */s/ Joseph J. Siprut*

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Counsel for Plaintiff
and the Proposed Putative Class

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing

Unopposed Motion For Extension Of Time To File Motion For Preliminary Approval Of

Class Action Settlement was filed this 17th day of August 2016 via the electronic filing system

of the Northern District of Illinois, which will automatically serve all counsel of record.

<u>   /s/ Joseph J. Siprut   </u>